DOCUMENT RESUME

ED 312 387 CE 053 456

TITLE Apprenticeship 2000. The Public Speaks. Report of Public Comments.
INSTITUTION Employment and Training Administration (DOL), Washington, DC. Bureau of Apprenticeship and Training.
PUB DATE Aug 88
NOTE 25p.; For related documents, see CE 053 457-458.
PUB TYPE Reports - Research/Technical (143)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Apprenticeships; *Educational Policy; Education Work Relationship; Experiential Learning; *Field Experience Programs; Industrial Training; *Labor Force Development; Nonschool Educational Programs; *Public Opinion; Skilled Workers; Work Experience Programs

ABSTRACT

This document contains the analysis of public responses to an issue paper published in the Federal Register (December 2, 1987) regarding the U.S. Department of Labor's Apprenticeship 2000 initiative, the purpose of which is to determine the future role of apprenticeship in meeting needs for a skilled work force. The document contains the following sections: (1) an introduction that lists the specific issues on which the public was invited to speak (Should/can the apprenticeship concept be broadened to all industries? What should be the limitations or parameters, in terms of occupations, of an expanded apprenticeship effort? What should be the delivery system for such a system? What should be the role of government in the system? How can apprenticeship be more effectively linked to the education system?) and detailed information on the 310 respondents; (2) an analysis of opinions regarding each issue; (3) three policy objectives (to expand the apprenticeship model to new occupations and industries; to build an apprenticeship system that encourages consistent standards, high quality flexible, portable, competency-based, and variable length apprenticeship programs; and to ensure that there is an effective delivery system and that the programs are coordinated with education and training systems) that have been formulated as a result of the analysis of public responses; and (4) an appendix that lists key words that appeared in the responses. (CML)

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APPRENTICESHIP 2000

THE PUBLIC SPEAKS

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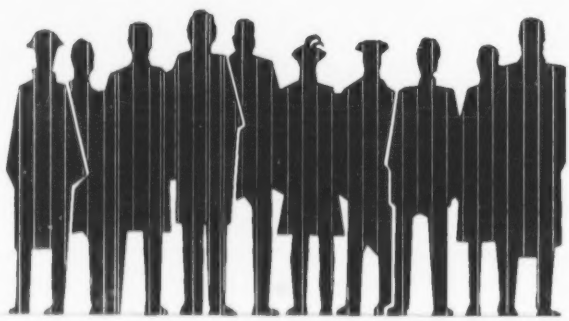

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
BUREAU OF APPRENTICESHIP AND TRAINING
AUGUST 1988

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APPRENTICESHIP 2000

REPORT

OF

PUBLIC COMMENTS

AUGUST 1988

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION
OFFICE OF JOB TRAINING PROGRAMS

PREPARED BY: THE BUREAU OF
APPRENTICESHIP AND TRAINING

PART I. INTRODUCTION

BACKGROUND

In December 1987, the Department of Labor launched the Apprenticeship 2000 initiative with the publication of an issue paper in the FEDERAL REGISTER, 52 FR 45904 (December 2, 1987). The purpose of this initiative is to review the apprenticeship concept to determine its future role in meeting America's needs for a skilled work force.

The basic premise of the initiative is that scrutiny should be given to the apprenticeship concept of structured on-the-job training combined with related classroom instruction, and serious consideration given to increasing the role of apprenticeship in preparing workers for skilled jobs. This is a concept which holds potential for meeting both the needs of employers in industries facing skill shortages as well as the needs of targeted populations, such as workers who may periodically require retraining or upgrading, dislocated workers, or the at risk youth population.

The outcome of the review will be a comprehensive report of findings and recommendations to be implemented over the next several years. These recommendations may result in administrative, regulatory, and possibly, legislative changes.

The apprenticeship review combines a public dialogue with a research program that includes both short and longer term research projects. The public dialogue began with the publication of the issue paper that identified five issues surrounding the review and possible expansion of the apprenticeship training concept and invited public comment. These five issues are:

- *Should/can the apprenticeship concept be broadened to all industries?*
- *What should be the limitations or parameters, in terms of occupations, of an expanded apprenticeship effort?*
- *What should be the delivery system for an expanded apprenticeship system?*
- *What should be the role of government in an expanded apprenticeship system?*
- *How can apprenticeship be more effectively linked to the education system?*

Publication of the issue paper was followed by three public meetings held in February in San Francisco, Chicago, and Washington, D.C. The meetings were announced in the FEDERAL REGISTER, 53 FR 961 (January 14, 1988), and the public was invited to attend and testify on these issues.

ANALYTICAL APPROACH

As of July 1, there were 310 respondents to the Apprenticeship 2000 issue paper. The analysis which follows was undertaken to arrive at a general understanding of how these respondents viewed the five issues and to gather a sense of their opinions on related concerns.

Persons interested in commenting had the opportunity to do so by letter or in person at one of the public meetings. Some did both, and their comments were treated as one submission.

Several organizations or associations were represented, at different meetings or by letter, by more than one individual. The general rule in this analysis was to treat such comments as separate submissions.

For purposes of this analysis, each submission was assigned to a respondent category to indicate what major interest was being represented. The major respondent groups were: Business and Industry; Labor Unions; Joint Apprenticeship and Training Committees; Government, including Federal, State and local, except education; Education, including governmental education agencies; and Public/Special Interest Groups.

The assignment of respondents to a particular group was based primarily on the letterhead for written responses and, for the public meetings, on how respondents identified themselves. Respondents who identified themselves in several ways, e.g., as an employer and a representative of an association were assigned to a category based upon the reviewer's judgment of the strength of the identification with one group or another.

The responses were reviewed against the five basic issues. Each of the five issues was assigned key words which were used to match the responses to the issues. For example, Issue 1 was tracked by the key words "expand," "study," "limited expansion," "do not expand," and "no response." Key words were also assigned to each of the other four issues. The key words used in this analysis are listed in Appendix A. Additional specific suggestions made by respondents and other significant comments relating to the issues were also captured and incorporated into the analysis.

The key words were not, for the most part, mutually exclusive. A respondent, in voicing an opinion or suggesting one approach, did not necessarily reject the opinions or alternatives represented by other key words. **Many respondents included the thoughts embodied in several key words in their opinions; each was separately recorded, producing more total opinions than total respondents.** *Because respondents frequently had several opinions or suggestions on a given issue, most of the analysis and most of the accompanying charts use opinions, and not respondents, as the basis for analysis. However, in some cases, it was both desirable and possible to report on the percent of respondents who addressed a particular issue. The narrative and the charts indicate whether the base is respondents or opinions.*

Not all of the 310 respondents addressed each of the five issues. In these cases, a "no response" code was used. The "no response" codes were backed out of the equation so that the analysis would show opinions as a percent of those respondents who specifically addressed an issue.

Many people responded quite broadly to some or all of the issues, or responded only indirectly. Thus, the analysis of the opinions cannot be a precise count, but is instead an indication of the relative frequency of the views expressed by respondents.

The comments were reviewed and coded by a review team of several staff from the Bureau of Apprenticeship and Training who among them possess a mix of experience with apprenticeship programs and other employment and training programs. Initially, a sample of letters and testimony was read and coded independently by each member of the team. The key words that each used to track opinions were compared and discussed by the review team to make sure that each member conducted the review from the same understanding of the key words. This procedure was undertaken to produce as consistent and objective a review as possible.

RESPONDENTS

Figure 1 shows the number of respondents in each of the six respondent groups and provides a graphic illustration of the distribution of the 310 respondents among the groups. Figure 2 shows the percentage of total respondents represented by each of these categories.

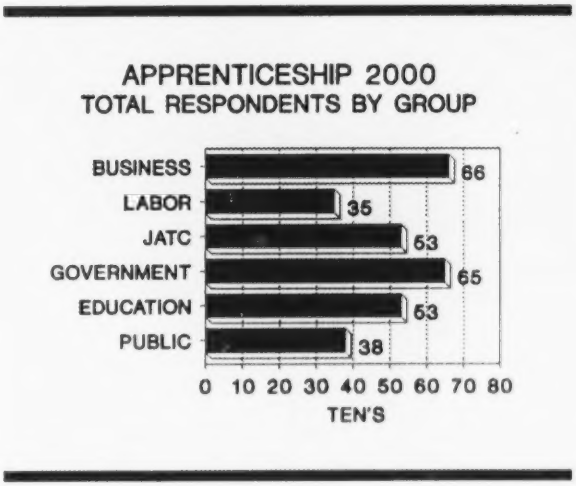


Figure 1

Business and Industry

Sixty-six respondents are included in the Business and Industry Group. Respondents in this category include both individual employers and associations representing groups of employers.

Thirty-eight percent of the respondents in this group represented associations while the remaining 62 percent were from individual employers, ranging from small firms to large corporations. In addition to the construction and building trades industry, the traditional apprenticeship core, there was substantial response from employers and associations in fields other than the construction industry. Employers and associations in these other industries such as transportation, manufacturing, printing and utilities accounted for 60 percent of the total respondents in this group.

The range of respondents in the Business and Industry Group is broad,

and together they represent a variety of interests in the private sector. Individual employers ranged in size from small local firms employing less than 50 persons to large national and multi-national corporations employing many thousands of workers.

Respondents in the association subgroup included national associations, regional or statewide divisions or affiliates of national associations, and local associations. Several associations each represented well over 3,000 employers while two of the larger associations represented 33,000 and 135,000 employers.

APPRENTICESHIP 2000
TOTAL RESPONDENTS

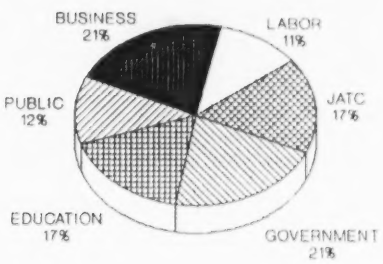


Figure 2

Labor Unions

Thirty-five respondents are included in the Labor Union Group. Respondents in this category include both international unions and local unions. About 71 percent of the responses came from international and local unions representing the construction industry, and the remaining 29 percent came from international and local unions outside the construction industry.

The largest subgroup of respondents in this category came from the local unions in the building and construction trades. Over half of the respondents came from this group, covering 13 different States and the District of Columbia. The international unions that responded represented, collectively, over 6,600 locals and 5,660,000 members.

Joint Apprenticeship and Training Committees

Fifty-three respondents are included in the Joint Apprenticeship and Training Committee (JATC) Group. A JATC is a labor management committee that administers an apprenticeship program for an employer or group of employers. It is composed of an equal number of representatives of the employer(s) and of the employees represented by a bona fide collective bargaining agent(s).

The 53 JATCs which responded came from 14 States plus the District of Columbia. However, two States accounted for over half of the responses received in this category -- Illinois, with about 30 percent and California, with almost 21 percent. Also, the responses in this category were dominated by JATCs representing the construction industry -- particularly for occupations such as electrician, sheet metal worker, plumber, pipefitter, operating engineer, ironworker, painter and carpenter.

Government

Sixty-five respondents are included in the Government Group. Government agencies representing "education" were

excluded from this group because the Education Group includes both public and private education institutions.

Seventy-five percent of the responses came from State governments representing 31 States plus Puerto Rico. While most of the responses received from State governments came from the offices of the State Labor Commissioner or the State Secretary of Labor, other State interests were included among the respondents, including corrections, health, transportation, human services, and economic development.

At the Federal level, responses were received from other components within the Department of Labor such as the Women's Bureau and the Employment Standards Administration, and from other agencies such as the Department of the Navy, the U.S. Army Continuing Education System and the Veterans Administration.

Education

Fifty-three respondents are included in the Education Group. Over half of the responses were received from public educational institutions which included 15 responses from institutions of higher learning. Of the remaining respondents, most were from State and local educational agencies, State Departments of Education and local Boards of Education.

Public/Special Interest Group

Thirty-eight respondents are included in the Public/Special Interest Group. Associations representing special interest groups accounted for 60 percent of the responses received in this category. A diverse range of interests was represented by respondents in this subgroup including the elderly, retired persons, women, nurses, and children. It should be noted that one association boasts a membership of 24,000,000 people. Other respondents in this group were individuals.

PART II. ANALYSIS OF OPINIONS

EXPANSION OF APPRENTICESHIP

Issue #1: Should/Can the Apprenticeship Concept Be Broadened to All Industries?

A large percentage of respondents (79 percent) addressed this basic issue, and they expressed 255 opinions on broadening the apprenticeship concept. Figure 3 shows that the great majority of the opinions were favorable to expansion.

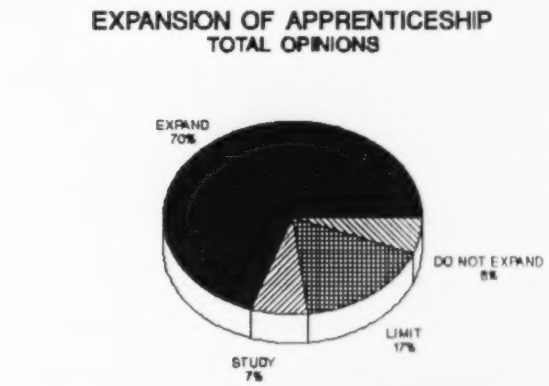


Figure 3

Of these 255 opinions, **94 percent believed that the apprenticeship concept could or should be expanded to additional occupations or to additional industries.** *Those who were in favor of expansion were counted in three categories: "expand", "limit", and "study".*

Although the line between "expand" and "limit" was often difficult to discern, it was possible to draw some broad distinctions. Thus, **70 percent of these opinions endorsed expansion without significant qualifiers; 17 percent supported expansion, but with limitations; and 7 percent were supportive but thought that additional study was needed to define suitable industries.**

Of those who would limit expansion, some suggested limiting expansion to specific industries. Among the industries suggested were banking and insurance, trucking, petrochemical, service, high tech and electronics, Federal agencies, and health care.

However, many, if not most of those who would limit expansion by industry, did not necessarily intend to exclude all others but were simply suggesting industries they believed suitable for apprenticeship. It is important to note that many respondents answered this question on industry expansion in terms of occupations (e.g., the concept is adaptable to most high skill occupations, or expansion should be limited to those industries which require substantial training).

For others who favor limits, the limitations were more generally stated. In this category, a few believed that

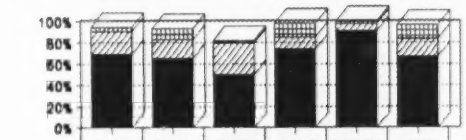
expansion should only be to industries willing to commit funds to the endeavor, and a few would expand to those industries important to the nation's security or to its competitive position in the world economy. **For many respondents, expansion was not specifically limited to particular industries, but was more generally tempered by labor market realities or experience with the existing apprenticeship system.** *For example, some respondents believed that any expansion should be designed to insure the participation of those members of the work force whose relative numbers will be expanding.*

The "study" opinion sometimes reflected a hesitancy to embrace expansion wholesale because it might, for example, perpetuate exclusion of women. And sometimes this opinion indicated the belief that no expansion should be undertaken without a careful, structured analysis of areas appropriate for apprenticeship.

All of these opinions were supportive of a broadened apprenticeship concept, though with differing degrees of qualifiers. Figure 4 shows the difference in support for expansion across all respondent lines. However, the most important point about this chart is the strength of support from all groups, ranging from 82 percent to 100 percent.

Only 6 percent of the opinions, as shown in Figure 3, indicated that apprenticeship should not be broadened to all, or additional industries. This opinion was held more strongly by some respondent groups than others. None of the respondents in the Education Group was opposed to expansion, while 18 percent of the JATCs did not favor expansion. Some of those who were opposed to expansion were not attempting to address the issue of broadening apprenticeship to all industries, but were answering narrowly, for their particular industry. Others thought that no expansion should take place until improvements had been made to the existing system, such as standardizing the course work for apprentices or improving the record on participation of women.

EXPANSION OF APPRENTICESHIP
FAVORABLE OPINIONS BY GROUP



	BUS	LAB	JATC	GOV	EDUC	PUB
TOTAL	94%	93%	82%	98%	100%	97%
STUDY	4%	10%	2%	13%	2%	13%
LIMIT	21%	17%	30%	11%	7%	17%
EXPAND	69%	66%	50%	74%	91%	67%

EXPAND LIMIT STUDY

Figure 4

DEFINING APPRENTICESHIP OCCUPATIONS

Issue #2: What should be the Limitations or Parameters, in Terms of Occupations, of An Expanded Apprenticeship Effort?

A large percentage of the respondents addressed this issue. Of the 310 total

respondents, 200 (65 percent) expressed views on whether there should be occupational limits and how these limits should be defined. In addition, a number of respondents expressed opinions and concerns relating to the quality of apprenticeship and how it can be restructured.

Respondents, in general, believed that the apprenticeship concept should not be expanded to all occupations. Rather, **there needs to be some definition or limit to those occupations to which the apprenticeship model is applied.**

Figure 5 illustrates, by group, percentages of those responding to this question who favor limits compared with those who believe there should be no limits, in terms of occupations, for expansion of apprenticeship. **A high percentage of all groups felt there should be limits to the occupations considered apprenticeable.**

There were no significant differences among the respondent groups on this basic question, indicating a general consensus. For example, at the lower end of the range, 75 percent of the opinions expressed by business were in favor of limits while at the higher end, 87 percent of the opinions of labor were supportive of occupational limits.

While there was consensus on establishing limitations, there was no general agreement on how these limitations should be defined. *It was possible, however, to categorize responses into specific kinds of limitations. Figure 6 shows the specific limiting factors, including "none," as a percentage of all those opinions directly related to occupational limits. Those who made more general comments related to this issue such as "don't dilute the apprenticeship concept" were not included in calculating the percentages.*

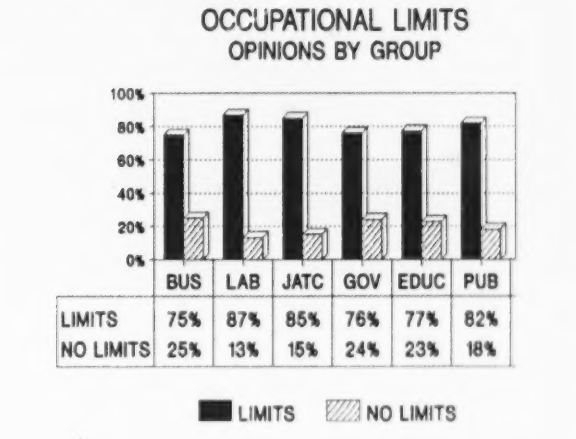


Figure 5

As shown in Figure 6, **the most common response, representing 36 percent of the opinions, was that expansion of the apprenticeship model should be targeted to skilled occupations.** *This response significantly outnumbered any other for the business, JATC, education and government groups and also was a frequent response given by labor and public interest group representatives.*

After "skill" the next most frequent opinion was "none". This does not necessarily mean, however, that these respondents believed that apprenticeship training is applicable to all occupations. More typically, opinions were expressed that there should be no rigid definition of

apprenticeable occupation. Instead, the definition should be flexible enough to allow for a broad expansion of apprenticeship. In this connection, one respondent said that there should be no artificial time limits, but that a distinction should be made between the expansion occupations, and existing apprenticeable occupations. By making this distinction, the results of the expansion effort can be separately evaluated.

OCCUPATIONAL EXPANSION
LIMITING FACTORS

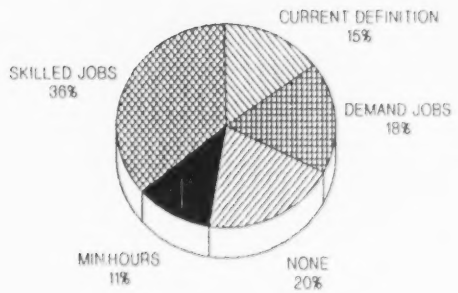


Figure 6

Another frequent response, representing 18 percent of the opinions, was to target expansion of apprenticeship training to demand occupations. In defining demand occupations, some respondents specifically mentioned emerging technical jobs in the service and health care industries. Others indicated it would be appropriate to identify critical skill shortage occupations. Others specifically said that industry, not government, should define demand occupations.

A smaller percentage of all opinions (15 percent) specified that the current definition of apprenticeable occupations was adequate and could be applied to any expanded apprenticeship effort. Criteria for apprenticeable occupations currently stipulate a minimum of 2000 hours of progressive on-the-job work experience with a recommended minimum of 144 hours of related technical training. While this opinion represented a small percentage of all opinions, it was the most frequent response given by individuals representing labor and JATC groups. Only a few individuals in the other groups specifically referred to the current definition.

Slightly more than 10 percent of the opinions recommended continuing using a minimum number of hours to determine apprenticeable occupations. It is quite likely that some of these respondents had in mind the current definition but did not specifically say so and thus, were counted in the "minimum hours" category. For others, however, using minimum hours was an appropriate criteria, but the existing minimum was not viewed as appropriate. Some did not specify a number, some thought the minimum number of hours should vary by occupation, and some had a particular number in mind, whether it was 1 year, 4000 hours, or 4 years.

In defining apprenticeable occupations, **a number of respondents said that instead of requiring specific hours of work experience in an occupation, that apprenticeship should be competency-based, with successful completion tied to achieving specified milestones rather than serving a minimum time**

period. *This comment came most frequently from education and business representatives but was also made in several responses from government and public interest representatives. One respondent went further by saying that there should be uniform standards to measure competency in order to promote transferability of apprenticeship credentials. Another recommended a competency-based instruction program combined with a method for awarding credit for previously acquired skills.*

Several other respondents said apprenticeship should be limited to occupations below the professional level, i.e. technical and subprofessional levels. However, another respondent suggested that apprenticeship should be used more broadly for managers. At least one respondent suggested that the term "internship" could be used for professions adopting the apprenticeship concept.

In addressing occupational limits, a number of opinions focused on the need to preserve the basic structure of apprenticeship. About 6 percent of the responses specifically cautioned against any dilution or watering-down of the apprenticeship concept. This comment was made by representatives from each of the interest groups. In this connection, **a number of respondents expressed concern about maintaining the quality of current programs.**

Although the words "quality" and "don't dilute" were frequently used, respondents had different ideas about quality and preserving the structure of apprenticeship. For some, quality was tied to minimum program standards while for others it is tied to the length of the programs. One respondent who believed that quality is essential believed that no programs should be less than 2 years. Another respondent said that minimum standards are needed to prevent "watered-down" programs which were defined as programs of less than 2 years. Both of these respondents were from the education community.

In this connection, several respondents maintained that the apprenticeship model should be applied only to occupations requiring a broad base of skills and knowledge and encompassing multi-disciplinary training. On the other hand, several respondents indicated that apprenticeship should address the more narrow, specialized occupations that are emerging in the labor market. Typical opinions ranged from the need to train "complete journey persons" to the need for shorter apprenticeships to accommodate emerging new technological positions.

A compromise to the narrow vs. general apprenticeship issue was suggested by about 5 percent of the opinions. Those who held this opinion suggested that apprenticeship programs can be modified to include tiered or levels of training, and could allow for specialization as well as the broader-based training. Such an arrangement could also provide a career ladder for workers. This suggestion came mostly from representatives of business, government, education and the interest groups.

As an example of tiered training, one respondent suggested as many as 12 levels of apprenticeship training, ranging from pre-apprentice to international business/industry/labor generalist. Within these levels, a wide range of occupations and specialties could be accommodated. The notion was that an individual could stop at any level but that all levels would receive regular

technological and skill development updating. Another respondent suggested a "step ladder" approach whereby a trade would identify the highest attainable skill level for an occupation and an individual could work towards that point.

Finally, in addressing apprenticeable occupations, **a number of respondents mentioned the need for continuing or upgrade training for journey level workers.** *Some thought that since nothing is static, all skills need to be refreshed over time. And for some, continued training was considered especially important because of the rapidly changing technology occurring in all industries. While this response was most frequently given by representatives from business, it was by no means isolated to business.* **Responses from all groups addressed the importance of continuing training.**

THE DELIVERY SYSTEM

Issue #3: What Should be the Delivery System for an Expanded Apprenticeship System?

Most respondents addressed this issue; however, there was little consensus among groups and some confusion over the meaning of a delivery system. When responding to this issue, many individuals addressed the role of government in administering apprenticeship rather than the role of those who can or should sponsor programs or deliver services. Thirty-seven percent of respondents did not address this issue.

The 195 respondents to this issue, representing 63 percent of the total, provided 261 specific suggestions on possible delivery systems for an expanded apprenticeship system. Even though there was a diversity of responses, it was possible to categorize most suggestions into six delivery possibilities--JATC, the existing system, flexible systems, partnerships, individual employers and associations.

It should be noted that there may be overlap among the areas because the term delivery system and who should participate in such a system may have had different meanings for different respondents. There was undoubtedly little agreement among respondents on the meaning of the key words used in compiling the opinions.

Figure 7 shows the distribution of opinions among the six delivery system possibilities, for those who specifically commented on the delivery system. It also should be noted that some respondents had more than one suggestion and, accordingly, the number of opinions from which the percentages were calculated well exceeds the number of respondents.

The type of delivery system with the highest percentage of responses is the Joint Apprenticeship and Training Committee -- JATC. *This is the traditional delivery system for apprenticeship and is prevalent in the sectors of the building and construction trades industry represented by labor unions as well as in certain manufacturing industries. The percent of opinions suggesting the JATC as the delivery system in any expanded effort ranged, within respondent groups, from a low of 5 percent to a high of 29 percent. Not surprisingly, the highest percentage was from the JATC respondents.*

A high percentage of opinions from labor recommended either the JATC or the

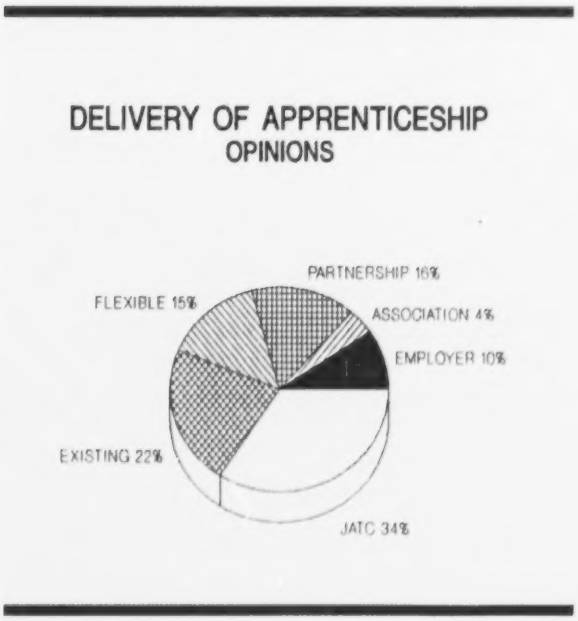


Figure 7

existing system. The existing system was also recommended by a significant percentage of those representing JATCs. Because of the likely confusion of terminology mentioned above, many of those who specifically cited "existing system" as the appropriate delivery system may have meant the JATC, which is the prevalent "existing system" in the construction trades and manufacturing industries. However, for other respondents, the opinion "existing system" meant what the reviewers intended by the key word -- the range of entities which currently sponsor apprenticeship programs, including JATCs, associations, individual employers, State and local government units and the military.

As indicated, a number of opinions from labor and the JATC groups gave the "existing system" suggestion, but this same recommendation was also made by at least several respondents from each of the other interest groups. It was the second most prevalent opinion, representing 22 percent of all suggestions. A typical comment made was that the current system works well and is a strong base for building an expanded apprenticeship effort.

Flexibility and partnership were the only other two areas to receive more than 10 percent of the opinions and partnership had somewhat different meanings for different respondents. Specifically, who should be included in the partnership differed among opinions. The typical response suggested a partnership of government, business, labor and education. However, there were variations on this basic recommendation. Within this framework, several individuals specifically said that there needs to be worker representation included in the delivery system regardless of whether there is a formal labor organization.

For example, one respondent believed that apprentices should be included on the committee that administers the apprenticeship program. Another respondent said that if there is no worker involvement, there will not be broad acceptance of the program. This same respondent made specific reference to the fast growing, nonunion service sector.

There was greater consistency among respondents who said that the delivery system needs to be flexible. About 15 percent of the opinions expressed were for a flexible system. This meant that no one system is applicable to all situations. Instead, the delivery system must be suited to particular circumstances, and most thought it should be determined locally. This comment was made by respondents from all interest groups but

most frequently by representatives from government.

About 10 percent of the respondents recommended that individual employers sponsor apprenticeship programs. One respondent suggested that major corporations can take a leading role in sponsoring apprenticeship programs. However, this suggestion came mainly from individuals representing business and government. Few respondents outside these two interest groups made this recommendation. Finally, a small percentage of responses, mainly from business, recommended using associations as a delivery system for an expanded apprenticeship system.

In responding to issue 3, many respondents focused on the role of education. This is logical since education, particularly the community and technical colleges, are a primary source for providing the related instruction outside the work site. **Many respondents felt that the role of education in apprenticeship needs to be strengthened. Opinions ranged from better coordination with education to making education a full participant in apprenticeship programs.**

The suggestion that education should be a full partner in delivery of apprenticeship programs came primarily from the education respondents, with almost 60 percent of the education respondents recommending specifically that education should be an equal partner in the delivery of apprenticeship programs. Typically, the education responses were directed at a greater role for the community colleges or for the vocational education system in general.

Within business and government a relatively significant percentage of respondents recommended strengthening the role of education in any expanded apprenticeship effort. Thirty-five percent of business and 21 percent of government respondents made this recommendation. However, within the other groups, relatively few respondents addressed education as it relates to delivery systems for apprenticeship programs.

GOVERNMENT ROLE

Issue #4: What Should Be the Role of Government in An Expanded Apprenticeship Program?

A total of 238 respondents addressed this issue, with 556 opinions on the role of government. Although some were commenting on what the role of government should be in the current system, many were addressing more directly the needs that they anticipated in an expanded program. An attempt was made in coding the responses to delineate the differences in roles that were suggested for State and Federal governments. Because a great number of respondents did not distinguish between the appropriate roles for the Federal government vs. State governments and, for those who did, the frequency of opinions related to each level of government was quite similar, opinions pertaining to State and Federal government roles were combined.

Furthermore, the issue was open-ended, and the list of conceivable opinions on government role was long. A great number of functions for government were suggested and many of these functions overlap, making generalizations difficult.

Nevertheless, a number of observations are possible and useful.

Figure 8 depicts the total opinions from all who responded with views on the role of either the Federal government, State governments, both, or government in general.

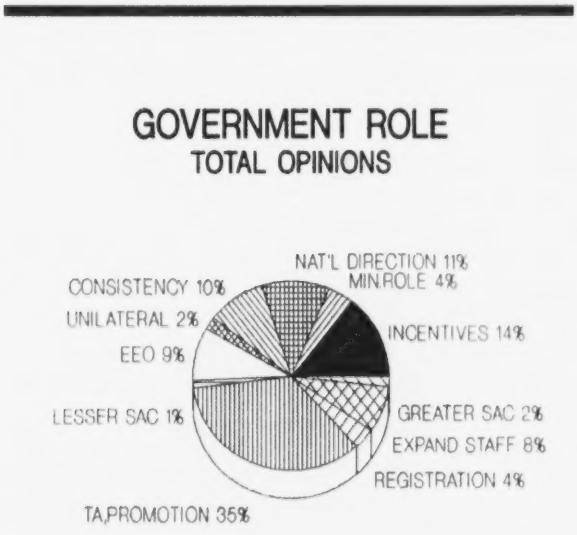


Figure 8

Technical assistance and promotion were mentioned most frequently as a role for government in the apprenticeship program and this preference was common to all respondent groups. Together they accounted for 35 percent of the opinions. *What type of assistance the government should provide and under what circumstances varied somewhat. For a few, the appropriate role for government was to provide assistance, but only when asked. For others, the provision of technical assistance was seen as an essential ingredient in an effective apprenticeship system, needed on many fronts -- from technical assistance in encouraging development of national standards, to technical assistance in promoting equal employment opportunity, to assisting in establishing JATCs. For some, technical assistance meant establishing apprenticeship information centers in all States, and others thought the focus should be on assistance in developing and updating curricula. In addition to traditional promotional activities, a few suggested that government should promote apprenticeship by providing a forum for linkages.*

After technical assistance and promotion, the frequency of responses on any particular role for government falls off considerably. The next most frequently mentioned role for government was to provide incentives. Fourteen percent of the opinions involved some form of incentive or financial assistance.

The type of specific incentive envisioned ranged from tax incentives and seed money for employer-based training, to pilots and model programs for different industries, to funding apprenticeship information centers. Several respondents suggested reimbursing States with Federal funds -- in a relationship similar to the Federal/State unemployment insurance arrangement -- for supporting an apprenticeship agency. Some suggested that government resources should be used to improve the overall quality of training.

Of all opinions on this issue, 11 percent were related to providing national direction. For the most part, this opinion reflects a general belief that to expand apprenticeship significantly will require considerable national attention, support and leadership. *For some, national direction meant an aggressive*

marketing campaign at the national level, and for others it meant assuring quality training sufficient to meet national needs for a strong economy and a strong defense. Several respondents believed that government should provide leadership by initiating apprenticeships for its employees.

Closely allied to the role of providing national direction was the role of assuring consistency and promoting uniformity, which accounted for 10 percent of the responses. This sometimes meant that government should establish national standards and use such standards to develop uniform training formats, and sometimes it reflected a concern with portability and the ability of apprentices and/or journey workers to transfer between companies or industries. Some thought that uniformity and portability could best be advanced through maintenance of a Federal data base, especially lists of jobs and certifications. For some, consistency meant equal access for parallel programs (apprenticeship programs, sponsored by open shops, in occupations for which there are existing registered programs sponsored by JATCs), and many who held this view thought consistency could not be assured with the existence of both Bureau of Apprenticeship and Training States and State Apprenticeship Council States.

Nine percent of the total opinions were related to the government's role in equal employment opportunity. Some believed the government must take a strong and active role in enforcing anti-discrimination regulations. And some expressed the view that the apprenticeship program needed to be strengthened for the Year 2000; and to accomplish this, the Bureau of Apprenticeship and Training needed to establish clear guidelines to help industries attract more women and minorities.

Although relatively few respondents delineated separate roles for the Federal and State governments, of those who specifically addressed State functions, 17 percent specifically supported an increased role for State Apprenticeship Councils and 12 percent thought their role should be decreased. About 9 percent of the opinions specifically addressing the Federal government role endorsed strengthening the role of the Bureau of Apprenticeship and Training.

LINKS TO EDUCATION

Issue #5: How Can Apprenticeship Be More Effectively Linked to the Education System?

The 242 respondents to Issue 5 registered 335 opinions on whether and how apprenticeship could be linked with the education system, either through school-to-work activities or through coordination arrangements designed to accomplish other objectives.

Although the title of Issue 5 asked, in general, how apprenticeship could be linked more effectively to education, the discussion of this issue focused more specifically on the school-to-work transition. (Can apprenticeship be linked to education in ways that could reduce the unproductive time that youth spend finding their niche in the labor market and thereby help to alleviate labor shortage problems anticipated because of the declining youth labor pool?) Opinions varied, with somewhat less than half specifically related to the school-to-work issue.

Among those who specifically addressed the advisability of developing a school-to-work linkage, there was overwhelming support for the concept, with 92 percent responding favorably, as shown in Figure 9.

EDUCATION LINKAGES
SCHOOL TO WORK OPINIONS

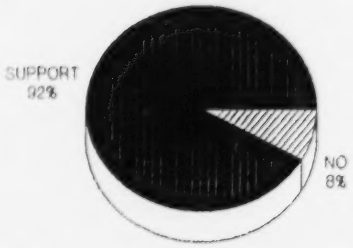


Figure 9

Support for school-to-work was highest among the government and education representatives, none of whom specifically stated opposition. Business support was also high, with 98 percent of the business opinions favorable. The least support for a school-to-work arrangement was found in the JATC group, which was evenly split among those who supported and those who opposed school-to-work linkages.

There was a variety of opinions about how best to structure or design a school-to-work program. *About a third thought that the secondary schools needed to initiate well-rounded career counseling programs, which could present apprenticeship as an attractive alternative to college. For this group, schools were too often rated on their ability to send students to college and educators were believed to see college as the only success. Some stated that counselors should have equal knowledge of the trades and the professions and that they needed to help remove the unfavorable image of the skilled trades apprenticeships that exists among some parts of both the education community and the broader population.*

About 10 percent of the opinions were specifically related to the idea of receiving credit for academic and vocational skills acquired in secondary school and having it count towards apprenticeship requirements. **Some suggested structured internships designed specifically to qualify students for apprenticeship upon graduation. And others specified the need for close employer involvement in any school-to-work programs to assure responsiveness to industry needs.** *Illustrative of this thinking was the recommendation to integrate vocational education with employer-specified standards and grant credit to students for achieving certain competencies.*

More than half the opinions on school-to-work were more general in nature, primarily showing unspecified support for the concept. Several believed that occupational education should begin long before career decisions are likely to be made, and suggested some career programs from grades Kindergarten through 12. More than one respondent remarked that school-to-work programs are designed to work for youth, but the Workforce 2000 projections will require

that we utilize all current workers and potential workers. **Consequently, attention must be given to building links with the education system that can attract women, minorities, and workers changing careers in mid-life.**

Eight percent of those who voiced opinions on the school-to-work concept were opposed to it. Some of these questioned the basic premise that we need to reduce the unproductive time of young people after they leave high school. Instead, some of these respondents thought that high school students were not mature enough to decide on a career and/or needed time to explore career possibilities. At least one respondent answered from the perspective of a particular industry, and did not encourage student involvement because of the pessimistic job growth prospects in that industry. A few did not want the apprenticeship system tied to the vocational education system.

The "other" responses were not separately categorized, but a sampling of the comments in this group illustrates the rich variety of opinion on this subject. Some responses were related to the role of the education community in providing related instruction to apprentices. Improvements to this process were suggested, such as arranging for apprentices to attend classes during normal working hours. Several respondents looked to a relationship with education as a link with resources, with some favoring full appropriation of the Carl D. Perkins Vocational Education Act resources. One recommended redirecting Perkins Act, Job Training Partnership Act and Federal Uunemployment Tax Act resources for preapprenticeship programs and for programs of continuing education.

For many, the question of links was primarily one for industry and education to address together, with many holding the opinion that industry needed to better communicate its concerns and needs to those in the education community. *There was the suggestion that the use of vouchers by employers should be explored as a way to make the education system responsive to industry needs.*

Many in the "other" category lamented the attention paid to college-bound youth, at the expense of those who wanted or needed to begin their careers following high school. *Among the most ambitious recommendations was the creation of a National Center for Applied Technology and Skills which would, among other things, train faculty for the nation's vocational schools, design curricula, and develop a certification system for teachers.*

In general, those who had comments in the "other" category believed that **education was a natural ally of training, particularly of apprenticeship which, by its nature, recognizes the interdependence of hands-on experience and theoretical knowledge.** *Coordination between education and apprenticeship was very much on people's minds, with several suggesting that the scrutiny now being placed on the education system represented an opportunity for building better linkages.*

A substantial percentage of respondents to Issue 5 commented on the need to improve the basic education of students coming out of the public secondary schools. *The data, shown in Figure 10, are especially*

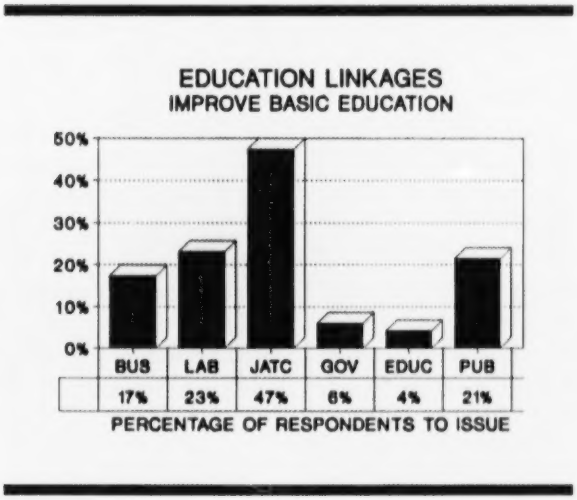


Figure 10

significant because the issue of basic education was not specifically raised in the issue discussion. JATCs, the respondent group which can be expected to have the most direct contact with apprentice applicants, mentioned the need to improve basic education with significantly more frequency than any other group.

The range of opinion on the need to improve basic education is from 47 percent for the JATCs to 6 percent and 4 percent for government and education, respectively. A few of the respondents, across all groups, were simply underlining the importance of basic education to any training effort.

But many more were explicitly critical of the education system for the alarming number of graduates who lack basic competencies in the "3Rs". These respondents often said that the job of the schools is to lay the foundation for developing skills, while the job of apprenticeship programs is to teach skills. And some expressed it as not getting their money's worth for their tax dollars.

PART III. NEXT STEPS

These responses and other available information have been analyzed in order to provide focus and direction for the next stages of the apprenticeship review. From this analysis, it was possible to identify areas of general consensus and other areas of broad interest and concern. As a result, three policy objectives have been formulated. These policy objectives will form the underpinnings for the next stage of the apprenticeship initiative -- development of short-term research issue papers and continued public outreach and dialogue. These policy objectives are:

- *To expand the apprenticeship model to new occupations and industries.*
- *To build an apprenticeship system which encourages consistent standards, high quality, flexible, portable, competency-based, and variable length apprenticeship programs.*
- *To ensure that there is an effective delivery system to administer new approaches to apprenticeship and that apprenticeship programs are coordinated with related education and training systems.*

The research program was announced as a notice in the June 3, 1988, FEDERAL REGISTER, 53 FR 20386. This program includes both short and longer term research. Thirteen specific topics for the shorter-term research were identified and announced. These topics support the basic policy objectives for the apprenticeship review. In addition to the specific topics, the Department will undertake a review of the basic authority for the national apprenticeship system -- the legislation and regulations.

A series of contracts were awarded to develop a number of the short-term issue papers. Other issue papers will be completed utilizing current Bureau of Apprenticeship and Training staff. The short term research will be completed in the early fall of 1988. Longer-term research and demonstration projects are planned to begin in early 1989.

The Department also plans additional public input. Bureau of Apprenticeship and Training officials have been meeting with key business and labor representatives to discuss the apprenticeship review. In the late summer and early fall a series of focus papers will be published for public comment in the FEDERAL REGISTER. These papers will present a wide range of options for expansion and change of the apprenticeship system.

The research and the public dialogue will culminate in a comprehensive report of findings and recommendations to be titled Apprenticeship: A Blueprint for the Future. This report is scheduled to be completed in December of 1988. It will include a series of specific recommendations and a possible timetable for implementing them.

APPENDIX A: Key Words

ISSUE #1 - EXPANSION OF APPRENTICESHIP

- *Expand*
- *Study*
- *Limited Expansion*
- *Do not Expand*
- *No Response*

ISSUE #2 - DEFINING APPRENTICESHIP OCCUPATIONS

- *No Limits*
- *Current Definition*
- *Skilled Occupations*
- *Minimum Hours*
- *Demand/Industry Recognition*
- *Tiered Programs*
- *Don't Dilute*
- *No Response*

ISSUE #3 - DELIVERY SYSTEM

- *Existing System*
- *JATC*
- *Employer*
- *Association*
- *Partnership*
- *Flexibility*
- *Worker Involvement*
- *Include Education*
- *No Response*

ISSUE #4 - GOVERNMENT ROLE

- o *General Government*
- o *Quasi-government*
- o *National Direction*
- o *Minimum Role*
- o *Incentives*
- o *Uniformity/consistency*
- o *Facilitate unilateral programs*
- o *EEO compliance*
- o *TA/coordination*
- o *Promotion*
- o *Expand staff/status*
- o *Registration*
- o *State - TA*
- o *State - Promotion*
- o *State - Incentives*
- o *State - EEO*
- o *State - Registration*
- o *Greater SAC Role*
- o *Lesser SAC Role*
- o *No Response*

ISSUE #5 - LINKS TO EDUCATION

- o *School-to-Work*
- o *School-to-Work/Options*
- o *School-to-Work/Academic Credit*
- o *No School-to-Work*
- o *Better Basic Education*

- o *Academic Credit*
- o *Other*
- o *No Response*